



# Bristol-Myers Squibb Company

Worldwide Medicines Group

P.O. Box 4000 Princeton, NJ 08543-4000 609 252-4000

October 6, 2000

The Performance Track Information Center  
C/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

**RE: Bristol-Myers Squibb Company (E.R. Squibb & Sons LLC – Lawrenceville Facility)  
Submittal of National Environmental Achievement Track Application**

To Whom It May Concern:

Enclosed please find for your review, the National Environmental Achievement Track Application for the Bristol-Myers Squibb Company, Lawrenceville, New Jersey facility.

Bristol-Myers Squibb Company (B-MS) is looking forward to becoming a Charter Member of the National Environmental Achievement Track Program. B-MS has demonstrated its commitment and leadership in protecting the environment and the health and safety of its employees, customers and the public. B-MS policy is to strive to conduct all its activities in an environmentally sustainable manner, taking into consideration the complex and interconnected relationship of our ecosystem. Given the common goals of our Corporate Environmental Policy and the National Environmental Achievement Track Program, B-MS believes it is an excellent candidate to become a Charter Member of this program.

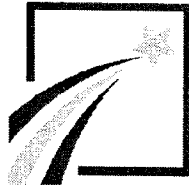
If you have any questions concerning this application or require further information please contact me at (609) 252-4319.

Sincerely,

David M. Matthews, CHMM  
Manager, Environmental Affairs

cc: T. Lyon  
S. Voigt  
C. Woodward  
J. Welling  
M. Vizcaya

A02-0034



***National  
Environmental  
Achievement Track***

***Application Form***

Bristol-Myers Squibb Company (permitted as E.R. Squibb & Sons, LLC)

Name of facility

Bristol-Myers Squibb Company

Name of parent company (if any)

Route 206 & Province Line Road

Street address

Street address (continued)

Lawrenceville, NJ 08648

City/State/Zip code

Give us information about your contact person for the  
National Environmental Achievement Track Program.

Name David M. Matthews

Title Manager, Environmental Affairs

Phone (609) 252-4319

Fax (609) 252-6062

E-mail Dave.Matthews@bms.com

***Why do we need this information?***

EPA needs background information on your facility to evaluate your application.

***What do you need to do?***

- Provide background information on your facility.
- Identify your environmental requirements.

# Section A

*Tell us about your facility.*

**1 What do you do or make at your facility?**

The Bristol-Myers Squibb Lawrenceville facility consists of 1.5 million square feet of building space situated on a 296 acre site. The Main Complex is comprised of nineteen (19) building modules containing space for offices, laboratories, and support services. The site currently has approximately 2400 employees.

The primary function of the Lawrenceville facility is pharmaceutical research and development activities for new drug discoveries. The facility mostly contains laboratory and office buildings and support operations such a powerhouse and maintenance operations.

The Lawrenceville site has historically engaged in numerous environmental improvement projects and all new initiatives have employed the most stringent environmental controls available. Therefore, the Lawrenceville facility has already achieved and will continue to achieve a high level of performance across all multi-media environmental measures.

**2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.**

SIC  
2834  
  
NAICS

*Section A, continued*

3 Does your company meet the Small Business Administration definition of a small business for your sector? ☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility? ☐ Fewer than 50  
☐ 50-99  
☐ 100-499  
☐ 500-1,000

5 Does your facility have an EPA ID number(s)? ☒ More than 1,000  
☒ Yes ☐ No

If yes, list in the right-hand column.

NJD001865534

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

A completed Environmental Requirements Checklist is enclosed.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

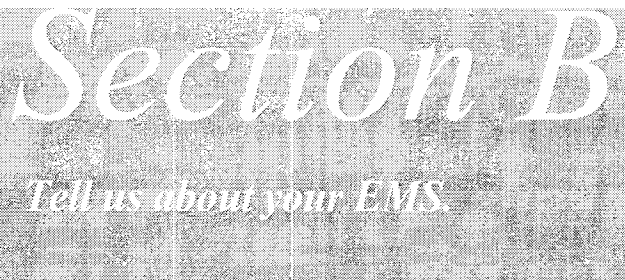
8 Optional: Is there anything else you would like to tell us about your facility?

### *Why do we need this information?*

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

### *What do you need to do?*

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check *yes* if your EMS meets the requirements for each element below as defined in the instructions.

*a.* Environmental policy ☒ Yes

*b.* Planning ☒ Yes

*c.* Implementation and operation ☒ Yes

*d.* Checking and corrective action ☒ Yes

*e.* Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI ☒ Other

☐ CEMP Principles of the ICC  
Business Charter for Sustainable Development

☐ Third-party assessment

☐ ISO 14001 Certification

☐ Other

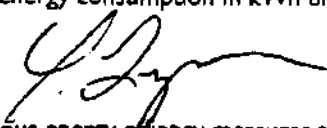
### What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

#### First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Total Energy Use	44.67	KWh/sq. ft.	43.34	KWh/sq. ft.
<p>i. How is the current level an improvement over the previous level?</p> <p>The facility has realized a reduction of approximately 1,900,000 kWh in total energy consumption in 1999 as a result of implementing energy efficiency measures at our facility. This reduction represents approximately 3% of the total site energy consumption in 1999. The values indicated above represent energy consumption which include realized savings relative to actual 1999 energy consumption in kWh divided by the sq. ft. of all buildings at the facility.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The Lawrenceville facility has implemented various energy efficiency measures that have resulted in significant energy conservation. These measures included the installation of low energy consumption lighting in our buildings, motion detection switches for our offices, reduction of air flow during nite time, and other energy saving initiatives.</p> 				

## Section C, continued

### Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Emissions of ozone depleting chemicals	1,348	pounds	0	pounds
<p>i. How is the current level an improvement over the previous level?</p> <p>The Lawrenceville facility has shown a significant improvement in reducing ozone depleting compounds by eliminating all halon use at the site.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The Lawrenceville facility has eliminated the use of all halon compounds at the site.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

**Note to small facilities:** If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

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*First aspect you've selected*

- a. What is the aspect? Total Water Use
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- |                                                                                                  |                                                 |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------|
| <input type="checkbox"/> Option A:<br>Absolute value                                             | (Quantity/Units)                                |
| <input checked="" type="checkbox"/> Option B:<br>In terms of<br>units of production<br>or output | 33,700<br>gallons/person/yr<br>(Quantity/Units) |
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- |                                                                                                  |                                                 |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------|
| <input type="checkbox"/> Option A:<br>Absolute value                                             | (Quantity/Units)                                |
| <input checked="" type="checkbox"/> Option B:<br>In terms of<br>units of production<br>or output | 33,400<br>gallons/person/yr<br>(Quantity/Units) |
- e. How will you achieve this improvement? This will be achieved by implementing water recycling or other measures at the facility in order to target the water consumption reduction goal.



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## *Second aspect you've selected*

- a. What is the aspect? Recycled/Re-Used Materials Use
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:  
Absolute value (Quantity/Units)
- ☒ Option B:  
In terms of units of production or output 283 pounds/person/yr (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:  
Absolute value (Quantity/Units)
- ☒ Option B:  
In terms of units of production or output 286 pounds/person/yr (Quantity/Units)
- e. How will you achieve this improvement? This will be achieved through the setting of goals, identifying opportunities, and implementing programs for the increase of recycling/re-use of materials. Since 1996, the Bristol-Myers Squibb Green Team supports a strong commitment to increased recycling numbers.

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### *Third aspect you've selected*

- a. What is the aspect? Emissions of Greenhouse Gases
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- |                                               |                                           |                                        |
|-----------------------------------------------|-------------------------------------------|----------------------------------------|
| <input type="checkbox"/> Option A:            | Absolute value                            | (Quantity/Units)                       |
| <input checked="" type="checkbox"/> Option B: | In terms of units of production or output | 37,400 lbs/person*<br>(Quantity/Units) |
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- |                                               |                                           |                                        |
|-----------------------------------------------|-------------------------------------------|----------------------------------------|
| <input type="checkbox"/> Option A:            | Absolute value                            | (Quantity/Units)                       |
| <input checked="" type="checkbox"/> Option B: | In terms of units of production or output | 35,900 lbs/person*<br>(Quantity/Units) |
- e. How will you achieve this improvement?
- This will be achieved through the setting of goals, identifying and reducing usage of Greenhouse Gas emitting sources, involvement in the Climate Wise Program and self generation of electrical power with lower emitting technology/fuels displacing more polluting Utility generated power.
- \* Only includes power generation stationary sources. Does not include mobile or other sources of greenhouse gas emissions.

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*Fourth aspect you've selected*

a. What is the aspect?

Energy Reduction

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

(Quantity/Units)

☒ Option B:  
In terms of  
units of production  
or output

671,935 BTU/sq. ft.  
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

(Quantity/Units)

☒ Option B:  
In terms of  
units of production  
or output

651,777 BTU/sq. ft.  
(Quantity/Units)

e. How will you achieve this improvement?

This will be achieved by implementing energy reduction goals and building construction practices at the facility which may include but are not limited to using increased natural lighting and focusing on energy efficient configurations of new office and laboratory space as well as replacing the site's older windows with energy efficient thermopane windows in order to target the energy reduction goal.

The EHS Codes of Practice are built upon the 16 principles of the International Chamber of Commerce Business Charter for Sustainable Development and the company's EHS policy. The codes articulate management system requirements for facility and functional-area business management. The EHS Codes of Practice serve as a blueprint for increasing productivity, growth, and customer focus by integrating EHS into our day-to-day business management systems. The codes also support compliance with applicable EHS laws, company policies, and company requirements. They serve as the basis for continual improvement of our operations worldwide.

We consider ISO 14001 to be a significant opportunity to demonstrate the integrity of Bristol-Myers Squibb's EHS management system. Our EHS technical staff and outside experts studied the ISO 14001 standard and compared its requirements to our own EMS. As a result, we became one of the first companies in the world to self-declare that our companywide EHS management system meets or exceeds the requirements of ISO 14001.

#### ERM Assessment of Bristol-Myers Squibb's Corporate EHS Evaluation Program

Environmental Resources Management, Inc. (ERM) conducted an assessment of the Bristol-Myers Squibb Corporate Environmental, Health, and Safety Evaluation Program. The assessment was conducted between November 1998 and January 1999.

ERM has concluded that the company's program is generally consistent with, and in some cases exceeds, expectations of the established criteria. A number of the program's elements are quite advanced when compared to practices in other companies.

These include:

- computerized audit program management system
- divisional grouping of evaluations and the subsequent formal reporting of results to divisional executives
- development, implementation, and assessment of the EHS Codes of Practice to ensure that facilities worldwide meet certain expectations
- use of a formal risk management tool to establish audit frequencies
- institution of staggered, biennial second-party and third-party quality assurance program reviews (and the effectiveness of management response to the results of these reviews)

### *Why do we need this information?*

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

## *Section D*

*Tell us about your public outreach and reporting.*

### *What do you need to do?*

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

The Bristol-Myers Squibb approach to public outreach is broad. We use a number of measures and programs to regularly communicate with and extend our hand in partnership to members of the public, particularly neighbors of our Lawrenceville facility. We notify our neighbors in advance of major construction, events and other activities that may impact them. In addition, we consider ourselves a part of the community. We have designed a brochure that highlights that we are not just in the community, we are also of the community... In addition, neighbors of Bristol-Myers Squibb are invited to attend programs at our Lawrenceville facility and on occasion we allow our facilities to be used for public programs.

There are several ways Bristol-Myers Squibb identifies and responds to community concerns.

BMS takes a proactive approach by working together with the public through its representation in the following:

- o The Lawrence Township Management Committee,
- o The Lawrence Township Fire Department,
- o The LEPC
- o Open Houses,
- o Gallery Events - that are open to the community
- o Positive relationship with the local citizen's association.

BMS has an ongoing positive relationship with our local POTW.

2 How do you inform community members of important matters that affect them?

At Bristol-Myers Squibb, we use a number of methods to inform neighbors of matters that affect them. We often find that oral communication is quick and often settles their concerns. At times and when warranted, we will correspond with neighbors through letter writing and other correspondence. BMS provides advice through community associations, and with close relationship with the Lawrenceville Township Manager.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website [www.bms.com](http://www.bms.com)

☐ Newspaper

☐ Open Houses

☒ Other

Newsletter shared with public

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	North Lawrence Citizens Association	David Prescott	(609) 921-3633
<i>State/Local Regulator</i>	Lawrence Township Local Government	Mayor Greg Puliti	(609) 883-0432
<i>Other community/local reference</i>	Breast Cancer Resource Center/YMCA Princeton	Jane Rodney	(609) 252-2005

On behalf of Bristol-Myers Squibb Company,

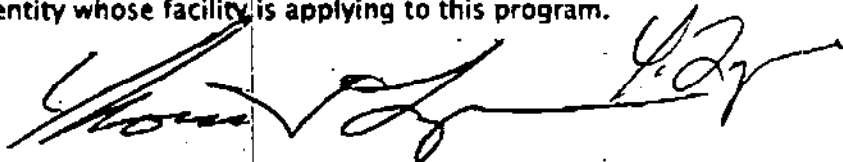
I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date



Printed Name/Title Thomas G. Lyon, Director, Facilities and Engineering

Facility Name Bristol-Myers Squibb Company (E.R. Squibb & Sons LLC - Lawrenceville)

Facility Street Address Route 206 & Province Line Road, Lawrenceville, NJ 08648

Facility ID Numbers NJD001-865534



## National Environmental Achievement Track

### Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

**Facility Name** Bristol-Myers Squibb Company (permitted as E. R. Squibb & Sons, LLC)  
**Facility Location:** Route 206 & Province Line Road, Lawrenceville, NJ 08648  
**Facility ID Number(s):** EPCRA: NJD001865534, NPDES No.: NJ0027618, NJDEP Air: 60069, NJDEP Title V: 61052, NJ DPCC: DIFF #110700179000, NJPDES: NJ0027618, TRI Fac ID: 08543BRSTLRTE20  
*(attach additional sheets if necessary)*

#### Air Pollution Regulations

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

Check All  
That Apply

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)**

13. New Source Performance Standards (40 CFR 60)/Title V Regulations
14. New Jersey Administrative Code (NJAC 7:27)

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

#### Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
  - Characteristic Waste
  - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- Manifesting ☒
- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
  - Transfer facility requirements ☐
  - Manifest system and record-keeping ☐
  - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
  - General facility standards ☐
  - Preparedness and prevention ☐
  - Contingency plan and emergency procedures ☐
  - Manifest system, Record keeping and reporting ☐
  - Groundwater protection ☐
  - Financial requirements ☐
  - Use and management of containers ☐
  - Tanks ☐
  - Waste piles ☐
  - Land treatment ☐
  - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

**Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)**

- 8. ☐
- 9. ☐

**Hazardous Materials Management**

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

**Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)**

- 6. New Jersey Worker and Community Right to Know Act, N.J.S.A.34:5A ☒
- 7. ☐

**Solid Waste Management**

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐

- |                                                 |                          |
|-------------------------------------------------|--------------------------|
| 3. Installation of Systems of Refuse Disposal   | <input type="checkbox"/> |
| 4. Solid Waste Storage and Removal Requirements | <input type="checkbox"/> |
| 5. Disposal Requirements for Special Wastes     | <input type="checkbox"/> |

**Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)**

- |                                               |                                     |
|-----------------------------------------------|-------------------------------------|
| 6. New Jersey Administrative Code (NJAC 7:26) | <input checked="" type="checkbox"/> |
| 7.                                            | <input type="checkbox"/>            |

**Water Pollution Control Requirements**

- |                                                                                                         |                                     |
|---------------------------------------------------------------------------------------------------------|-------------------------------------|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)                                 | <input checked="" type="checkbox"/> |
| 2. Designation of Hazardous Substances (40 CFR 116)                                                     | <input checked="" type="checkbox"/> |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)                         | <input checked="" type="checkbox"/> |
| 4. NPDES Permit Requirements (40 CFR 122)                                                               | <input checked="" type="checkbox"/> |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129)                                                      | <input type="checkbox"/>            |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)                           | <input type="checkbox"/>            |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)          | <input type="checkbox"/>            |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)        | <input type="checkbox"/>            |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)                  | <input type="checkbox"/>            |
| 10. Water Quality Standards                                                                             | <input checked="" type="checkbox"/> |
| 11. Effluent Limitations for Direct Dischargers                                                         | <input type="checkbox"/>            |
| 12. Permit Monitoring/Reporting Requirements                                                            | <input checked="" type="checkbox"/> |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | <input type="checkbox"/>            |
| 14. Collection, Handling, Processing of Sewage Sludge                                                   | <input type="checkbox"/>            |
| 15. Oil Discharge Containment, Control and Cleanup                                                      | <input checked="" type="checkbox"/> |
| 16. Standards Applicable to Indirect Discharges (Pretreatment)                                          | <input checked="" type="checkbox"/> |

**Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)**

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| 17. New Jersey DPCC/DCR (NJAC 7:1E) | <input checked="" type="checkbox"/> |
| 18.                                 | <input type="checkbox"/>            |

**Drinking Water Regulations**

- |                                                                                            |                          |
|--------------------------------------------------------------------------------------------|--------------------------|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | <input type="checkbox"/> |
| 2. National Primary Drinking Water Standards (40 CFR 141)                                  | <input type="checkbox"/> |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)             | <input type="checkbox"/> |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources   | <input type="checkbox"/> |

5. Underground Injection Control Requirements ☐
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

**Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)**

7. ☐
8. ☐

**Toxic Substances**

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

**Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)**

10. ☐
11. ☐

**Pesticide Regulations**

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

**Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)**

9. ☐
10. ☐

**Environmental Clean-Up, Restoration, Corrective Action**

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐

2. RCRA Corrective Action (identify)

☐☐☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,  
Corrective Action Regulations Not Listed Above (identify)**

3.

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Bristol-Myers Squibb Company

Pharmaceutical Group

PO Box 4000 Princeton, NJ 08543-4000 (609) 252-4000

A02-0034

RAPIFAX COVER SHEET

**PLEASE DELIVER IMMEDIATELY**

TO: Evans Stamatakis  
COMPANY: USEPA - Region II  
FAX NO.: 212-637-3771  
TELEPHONE NO.: 212-637-3742  
NUMBER OF PAGES: 3  
DATE: 12-1-00 (including cover sheet)

FROM: Dave Matthews  
FAX NO.: 609-252-6062  
TELEPHONE NO.: 609-252-4319  
NOTES: Enclosed are:  
1) the energy reduction data in  
kilowatt hours/square foot and  
2) initialed sign certification and C.I. sheets  
If you have any further questions,  
please contact me: - DAVE


\*\*\* If transmittal is not received clearly and/or completely, please call (609) 252-4489.  
Thank you.

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the Instructions, you are required to report past achievement for at least one environmental aspect.

*First aspect you've selected*

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Total Energy Use	44.67	KWh/sq. ft.	43.34	KWh/sq. ft.
<p>i. How is the current level an improvement over the previous level?</p> <p>The facility has realized a reduction of approximately 1,900,000 kWh in total energy consumption in 1999 as a result of implementing energy efficiency measures at our facility. This reduction represents approximately 3% of the total site energy consumption in 1999. The values indicated above represent energy consumption which include realized savings relative to actual 1999 energy consumption in kWh divided by the sq. ft. of all buildings at the facility.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The Lawrenceville facility has implemented various energy efficiency measures that have resulted in significant energy conservation. These measures included the installation of low energy consumption lighting in our buildings, motion detection switches for our offices, reduction of air flow during nite time, and other energy saving initiatives.</p> 				

On behalf of Bristol-Myers Squibb Company,

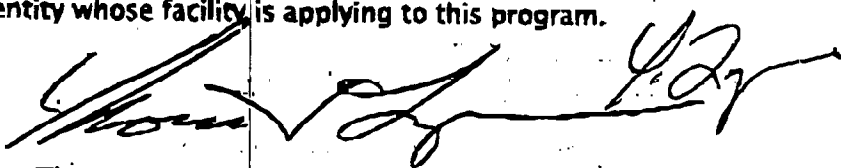
I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*.
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date



Printed Name/Title

Thomas G. Lyon, Director, Facilities and Engineering

Facility Name

Bristol-Myers Squibb Company (E.R. Squibb & Sons LLC - Lawrenceville)

Facility Street Address

Route 206 & Province Line Road, Lawrenceville, NJ 08648

Facility ID Numbers

NJD001865534



# National Environmental Achievement Track

## Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

**Facility Name** Bristol-Myers Squibb Company (permitted as E. R. Squibb & Sons, LLC)  
**Facility Location:** Route 206 & Province Line Road, Lawrenceville, NJ 08648  
**Facility ID Number(s):** EPCRA: NJD001865534, NPDES No.: NJ0027618, NJDEP Air: 60069, NJDEP Title V: 61052, NJ DPCC: DIFF #110700179000, NJPDES: NJ0027618, TRI Fac ID: 08543BRSTLRTE20  
*(attach additional sheets if necessary)*

### Air Pollution Regulations

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

Check All  
That Apply

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**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)**

13. New Source Performance Standards (40 CFR 60)/Title V Regulations
14. New Jersey Administrative Code (NJAC 7:27)

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### Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
  - Characteristic Waste
  - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)

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